

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NAULA NDUGGA, ON BEHALF OF  
HERSELF AND SIMILARLY SITUATED  
WOMEN,

Case No. 1:20-cv-07464 (GHW) (GWG)

Plaintiff,

**DECLARATION OF NAULA NDUGGA IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION**

-against-

BLOOMBERG L.P.,

Defendant.

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I, Naula Ndugga, declare:

1. I have personal knowledge of the matters discussed below, and if called as a witness, I could and would competently testify to this information.

2. I currently reside in Brooklyn, New York. I am 29 years old.

3. I am the named Plaintiff in the lawsuit captioned above.

4. I understand my responsibilities as a class representative. I am willing and able to vigorously pursue this litigation, as my active involvement thus far demonstrates.

5. I understand and agree that my role as a class representative is to represent the proposed U.S. and New York classes in the litigation, and not to place my own interests above the interests of the classes.

6. I understand that my duties as a class representative include, but are not limited to the following: (1) participating actively in the litigation by testifying at deposition and any hearing, answering written interrogatories and requests for admission, producing documents when required, and keeping generally aware of the status and progress of the proceedings; (2) accepting that any resolution of a class action lawsuit, such as by settlement or dismissal, is subject to the Court's approval and must be in the best interests of the classes as a whole; and (3) making every effort to provide my lawyers and the Court with all relevant facts of which I am aware.

7. I have already participated actively in the discovery process, including by sitting for a full-day deposition, answering written interrogatories, producing over 5,000 documents, and responding to requests for admission, as well as by keeping in contact with my attorneys and monitoring their work in this case.

8. I am not aware of any conflicts between myself and other members of the proposed classes or any reason why I cannot represent and protect the proposed class members' interests in this litigation.

9. During the life of this case, I have done and will continue to do my best to represent the interests of the other women reporters, editors, and producers from Bloomberg News.


10. My interest in this lawsuit is to recover back pay and other damages resulting from Defendant's unlawful conduct.

11. I worked for Bloomberg News during the class period, and am a member of the classes I seek to have certified.

12. I was subject to the same policies and practices regarding compensation as other women in the proposed classes.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: 7/10/2025 | 12:06 PM PDT  
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DocuSigned by:  
  
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Naula Ndugga